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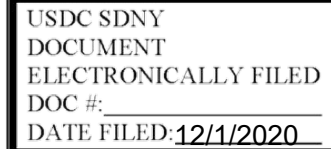
November 30, 2020

Hon. John P. Cronan

U.S. District Court

500 Pearl St.

New York, NY 10007



Re: *U.S. v. 12,860 in U.S. Currency*, 20 cv. 5189

Dear Judge Cronan:

I was previously appointed by Your Honor, pursuant to the CJA Act, to serve as counsel for George Bouyagian so that he can file a Claim and serve an Answer the Complaint filed in the above referenced matter.

On this date, I filed a Claim on behalf of Mr. Bouyagian. Pursuant to 18 U.S.C. §983(a)(4)(A), which references Rule G(5)(a)(i)(C) of the Federal Rules of Civil Procedure Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, the Claim is required to be signed by the Claimant (Mr. Bouyagian) under penalty of perjury. The currently filed Claim is not signed by Mr. Bouyagian. I have sent a copy to him requesting he sign and return it to me. I was counsel to Mr. Bouyagian in the underlying criminal case during which the seizure of the currency at issue occurred. As such, the information set forth in the Claim is based my knowledge of the underlying criminal case and conversations with Mr. Bouyagian. Accordingly, I anticipate that Mr. Bouyagian will sign the Claim.

The deadline for filing a Claim is today. In order to protect Mr. Bouyagian's interest, I filed the unsigned Claim on his behalf. It is my intention to supplement, or replace, the filing with a Claim signed by Mr. Bouyagian. However, as the Pandemic has significantly restricted inmate access to mail, email and telephones, there may be delay in my receiving the signed Claim from Mr. Bouyagian.

In light of the foregoing, please accept this letter in lieu of a formal motion granting me leave to later supplement or replace the currently filed Claim with one which is signed by Mr. Bouyagian.

I have conferred with the Government and they do not object to this application.

Respectfully submitted,

/s/

Jeffrey G. Pittell

cc: Louis Pellegrino, AUSA  
George Bouyagian

Mr. Pittell's motion requesting leave to replace the currently filed Notice of Claim (Dkt. 13) with one bearing Mr. Bouyagian's signature once it is received is GRANTED. Absent further leave of Court, Mr. Pittell must replace the Notice of Claim by December 21, 2020.

SO ORDERED.

Date: December 1, 2020  
New York, New York

  
JOHN P. CRONAN  
United States District Judge